


Good afternoon and welcome to the BSA E-Filing System Suspicious Activity Report webinar. Today we will go over the upcoming changes to the FinCEN SAR as well as provide a technical overview of the new FinCEN SAR XML schema and user guide. We will be recording this session and will make the recording available for download on the BSA E-Filing web site.



Focus/Purpose

Target audience:

- FinCEN SAR Batch Filers
- Application and software developers with knowledge of XML

Purpose:


- Provide summary of FinCEN SAR changes
- Provide technical overview of the new SAR XML Schema

ATTENTION: FinCEN SAR Discrete Filers

- The updated FinCEN SAR will be available for submission via the BSA E-Filing System in June of 2018.
- No system changes are needed to start utilizing the new FinCEN SAR.
- If you maintain templates or copies of the current FinCEN SAR on your PC, the system will accept the current version of the FinCEN SAR until January 1, 2019.

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The target audience for this webinar are application and software developers who develop systems and software to extract data from databases to create batch files for upload to the BSA E-Filing System. We will provide a summary of the upcoming SAR changes, as well as a technical overview of the new SAR XML schema format the BSA E-Filing System will start accepting in June of 2018. If you are a discrete/online filer, the SAR will automatically be updated in June. There are no system changes needed for discrete filers, the new SAR will be available to download and submission in June. If you have local copies of the SAR stored as templates (for example, a blank SAR with your bank information stored), you can continue to submit these templates until January 1, 2019. As this is a technical webinar focused on batch filing, we would request if you are a discrete filer to logoff from the webinar to allow any application or software developer to attend. We will be recording this webinar so you will be able to view the recording at a later date.



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Agenda

- Key Dates
- Overview of FinCEN SAR Updates
- FinCEN SAR XML User Guide Walk Through
- FinCEN SAR XML Field Mapping
- FinCEN SAR XML Example
- Questions

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We will be covering the following areas during this webinar. We will discuss the key dates for the system changes and the impact to the filing community. We will provide an overview of the upcoming changes to the SAR. We will then walkthrough of the SAR XML User Guide. We have documented the mapping between the updated SAR discrete form and the SAR XML Schema directly in the User Guide. This information will be presented to assist with identifying the association between the SAR Discrete report and the SAR XML schema. We will then provide an example of a SAR XML batch file. Finally, we will solicit questions from the participants using the webinar software interface. Participants can type in their questions and we will respond to common questions being received. We will attempt to answer as many of your questions as possible by the end of this webinar and in the follow-up webinar soon to be scheduled.

 Key Dates
<p>Target Deployment Dates:</p> <ul style="list-style-type: none"> ➤ May 11, 2018: BSA E-Filing “User Test” Environment ➤ June 22, 2018: BSA E-Filing “Production” Environment <p>What filers should expect...</p> <ul style="list-style-type: none"> ➤ FinCEN SAR Discrete form updated to include new and revised fields. ➤ FinCEN SAR Batch form updated to accept XML batch format and provide batch validation feedback upon submission. ➤ FinCEN SAR Acknowledgements returned for each accepted submission. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><u>IMPORTANT: The current FinCEN SAR discrete and ASCII batch format will continue to be accepted by FinCEN until January 1, 2019</u></p> <p>After January 1, 2019:</p> <ul style="list-style-type: none"> ▪ BSA E-Filing System will ONLY accept the updated FinCEN SAR discrete form ▪ BSA E-Filing System will ONLY accept FinCEN SAR batch files in XML format ▪ BSA E-Filing System will REJECT FinCEN SAR batch files in ASCII format! </div> <p style="text-align: right;">4</p>

June 22, 2018, to deploy the updated SAR discrete and XML batch filing functionality to the Production environment. Please note: one month prior on May 11, 2018, FinCEN will deploy the SAR XML batch filing functionality to the User Test environment to allow batch filers the ability to test with BSA E-Filing prior to submitting to production.

Once deployed to production, the updated SAR Discrete form will be available on the site for download, input, and submission. In addition, the SAR Batch form will be updated to accept batches in the new SAR XML format. Server-to-server batch filers will also have the ability to file using the new XML format. Batch validation data will be generated upon submission and provided to the batch filer, as well as acknowledgement data in XML format returned for each accepted SAR batch.

The BSA E-Filing System will continue to accept the current SAR Discrete form if you have locally stored copies and also the current SAR ASCII Batch format until January 1, 2019. After this date, the BSA E-Filing System will be updated to only accept the updated SAR Discrete form. The system will also be updated to only accept the SAR XML format for batch submissions. Once this update is complete, any SAR ASCII Batch format submitted will be REJECTED by the system. This timeline allows approximately 1 year for all SAR Discrete and ASCII batch filers to convert over to the new SAR.



Overview of FinCEN SAR Changes

**Updates to the FinCEN SAR are defined in the
Federal Register notice posted on February 2nd, 2017**

<https://www.federalregister.gov/documents/2017/02/02/2017-02235/proposed-collection-comment-request-update-and-revision-of-the-fincen-suspicious-activity-reports>

The following list provides an overview of the changes to the FinCEN SAR:

- New fields
 - Filing institution note to FinCEN
 - Part II. Cyber event suspicious activity type (and associated subtypes)
 - Part II. Cyber Event Indicators
- Updates to existing fields
 - Part II. Updated selections associated with various suspicious activity types
 - Part II. Date and Timestamp added to IP Address
 - Part II. Updated selections associated with suspicious activity product type(s)
 - Part III/IV. Updated subtypes associated with Securities and Futures institution

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For a detailed list of the upcoming changes to the SAR, you may refer to the Federal Register notice posted on February 2, 2017.

The next few slides will provide an overview of the changes to the SAR, which we have categorized as “New fields” and “Updates to existing fields”.


Three new fields are being added to the SAR.

- The first is the Filing institution note to FinCEN: This text field allows the filer to alert FinCEN that the SAR is being filed in response to a current specific geographic targeting order (GTO), advisory, or other activity.
- The second new field is a Cyber event suspicious activity type and associated subtypes added to Part II.
- The third new field is a Cyber Event Indicators field where the filer can report various cyber events such as Command and control IP addresses, Ports, Suspicious file names, etc.

Updates to existing fields include:

- Updated subtype selections associated with various suspicious activity types in Part II;
- New Date and Timestamp fields added to the IP Address field Part II;

- Updated selections associated with suspicious activity product type(s) in Part II;
- And Updated subtypes associated with Securities and Futures institutions in Parts III and IV.



Overview of FinCEN SAR Changes

Part II. Updated selections associated with various suspicious activity types

➤ New/Modified subtype selections associated with various existing categories of suspicious activities.

• For example, update to "Item 41. Mortgage Fraud" as follows:

○ Added "Appraisal fraud" and "Origination fraud"

○ Modified Foreclosure to "Foreclosure/Short sale fraud"

○ Removed "Reverse mortgage fraud"

41 Mortgage Fraud

a ☐ Application fraud

b ☐ Appraisal fraud

c ☐ Foreclosure/Short sale fraud

d ☐ Loan modification fraud

e ☐ Origination fraud

z ☐ Other

Part II. Date and Timestamp added to IP Address

➤ New text fields to accompany the IP Address field in Part II in order to record the date and/or timestamp of the first instance of the reported IP address.


43 IP address (if available)

Date


Time Stamp (UTC)

(talk to specific changes detailed on the slide)


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 Overview of FinCEN SAR Changes		
Part II. Updated selections associated with suspicious activity product type(s)		
➤ New type selections associated with the product type(s) involved in the suspicious activity in Part II: <ul style="list-style-type: none"> • f. Deposit accounts • m. Microcap securities. 		
45 Were any of the following product type(s) involved in the suspicious activity? (Check all that apply)		
a <input type="checkbox"/> Bonds/Notes b <input type="checkbox"/> Commercial mortgage c <input type="checkbox"/> Commercial paper d <input type="checkbox"/> Credit card e <input type="checkbox"/> Debit card f <input type="checkbox"/> Deposit account g <input type="checkbox"/> Forex transactions	h <input type="checkbox"/> Futures/Options on futures i <input type="checkbox"/> Hedge fund j <input type="checkbox"/> Home equity line of credit k <input type="checkbox"/> Home equity loan l <input type="checkbox"/> Insurance/Annuity products m <input type="checkbox"/> Microcap securities n <input type="checkbox"/> Mutual fund	o <input type="checkbox"/> Options on securities p <input type="checkbox"/> Prepaid access q <input type="checkbox"/> Residential mortgage r <input type="checkbox"/> Security futures products s <input type="checkbox"/> Stocks t <input type="checkbox"/> Swap, hybrid, or other derivatives z <input type="checkbox"/> Other <input type="text"/>
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(talk to specific changes detailed on the slide)

<div>  <div>Overview of FinCEN SAR Changes</div> </div>			
Part III/IV. Updated subtypes associated with Securities and Futures institution			
➤ New subtype selections associated with the type of securities and futures institution in Part III (Financial institution where activity occurred) and Part IV (Filing institution). <ul style="list-style-type: none"> Adds Execution-only broker securities Adds Self-clearing broker securities 			
80 Type of Securities and Futures institution or individual filing this report - check box(es) for functions that apply to this report	<input type="checkbox"/> Clearing broker-securities <input type="checkbox"/> CPO/CTA <input type="checkbox"/> Execution-only broker securities <input type="checkbox"/> Futures commission merchant <input type="checkbox"/> Holding company <input type="checkbox"/> Introducing broker-commodities	<input type="checkbox"/> Introducing broker-securities <input type="checkbox"/> Investment adviser <input type="checkbox"/> Investment company <input type="checkbox"/> Retail foreign exchange dealer <input type="checkbox"/> Self-clearing broker securities <input type="checkbox"/> SRO Futures	<input type="checkbox"/> SRO Securities <input type="checkbox"/> Subsidiary of financial/bank holding company <input type="checkbox"/> Other (specify below) <input type="text"/>
54 Type of Securities and Futures institution or individual where activity occurred - check box(es) that apply to this report	<input type="checkbox"/> Clearing broker-securities <input type="checkbox"/> Execution-only broker securities <input type="checkbox"/> Futures commission merchant <input type="checkbox"/> Holding company <input type="checkbox"/> Introducing broker-commodities	<input type="checkbox"/> Introducing broker-securities <input type="checkbox"/> Investment adviser <input type="checkbox"/> Investment company <input type="checkbox"/> Retail foreign exchange dealer <input type="checkbox"/> Self-clearing broker-securities	<input type="checkbox"/> Subsidiary of financial/bank holding company <input type="checkbox"/> Other (specify below) <input type="text"/>

(talk to specific changes detailed on the slide)



XML User Guide Walk Through

FinCEN SAR XML User Guide Overview

- The FinCEN SAR XML User Guide outlines the overall structure of the FinCEN SAR batch schema, including detailed business and validation rules to support the electronic batch transmission of the FinCEN Suspicious Activity Report (FinCEN SAR).
 - The FinCEN SAR XML User Guide can be downloaded at:
https://bsaefiling.fincen.treas.gov/docs/XMLUserGuide_FinCENSAR.pdf
 - The batch FinCEN SAR XSD file can be downloaded at:
https://www.fincen.gov/base/EFL_SARXBatchSchema.xsd
- The FinCEN SAR XML User Guide provides a detailed description for each element associated with the FinCEN SAR, such as:
 - Element name and description
 - When and when not to record the element
 - What value(s) can be recorded for the element
 - How many iterations the element may be recorded
 - Conditions to avoid that will result in reporting errors

The information in the User Guide should be used to update your systems to extract BSA data in accordance with the FinCEN SAR XML batch schema

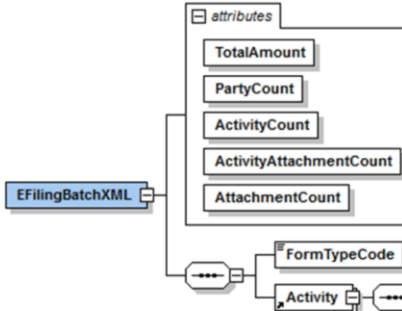
10

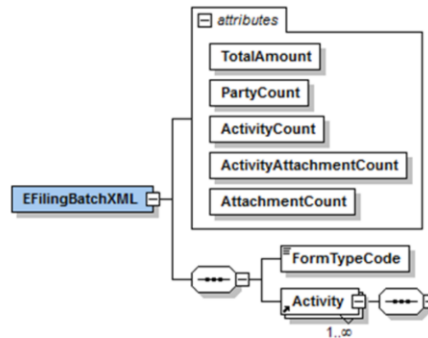
In addition to the field updates and changes to SAR, FinCEN is moving to the industry standard of XML for transfer and acceptance of batch filings. This format allows for additional data validation via an XML schema, a more flexible means for future updates or changes, and should make the level of effort needed for programming updates substantially lower as compared to the current ASCII fixed-length format. FinCEN has posted the SAR XML batch schema, as well as the SAR XML User Guide on the BSA E-Filing web site to assist batch filers. The links to these documents are displayed on this slide. The User Guide is the equivalent to the Electronic Filing Requirements for the ASCII format. The document outlines the business and validation rules to support the electronic batch submission of the SAR in XML format, including a detailed description for each element associated with the FinCEN SAR, such as:

- Element name and description
- When and when not to record the element
- What value(s) can be recorded for the element
- How many iterations the element may be recorded
- Conditions to avoid that will result in reporting errors

Application developers can use the XML User Guide in combination with the actual Batch Schema to extract BSA data and create an E-Filing SAR XML batch for upload to the BSA E-Filing System.


Overall File Organization

- The following diagrams outline the overall layout of the FinCEN SAR XML batch, as outlined in Section 2.1 of the User Guide.
- The first element in the XML batch is the **EfilingBatchXML** (i.e. the “root” element). It contains various batch level attributes such as the sum of all total amounts recorded for each FinCEN SAR in the batch. It is also the container for each FinCEN SAR in the batch beginning with the Activity element.
- 
- The diagram illustrates the structure of the **EfilingBatchXML** element. It is represented as a blue box with a small connector icon on its right side. A line extends from this connector to a larger, light gray box representing the **attributes** section. This section contains five stacked rectangular boxes: **TotalAmount**, **PartyCount**, **ActivityCount**, **ActivityAttachmentCount**, and **AttachmentCount**. Below the **attributes** section, the line continues to a rounded rectangle containing an ellipsis (...). From this rounded rectangle, a line branches out to a box labeled **FormTypeCode**. Below **FormTypeCode**, the line continues to a box labeled **Activity**, which is followed by another rounded rectangle containing an ellipsis (...), indicating a sequence of **Activity** elements.



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(talk to specific slide details)



FinCEN SAR XML: File Layout

Overall File Organization (cont.)

Activity

ActivityAssociation

ActivitySupportDocument

Party

6.1203

SuspiciousActivity

ActivityIPAddress

0.99

CyberEventIndicators

0.99

Assets

0.31


AssetsAttribute

0.396

ActivityNarrativeInformation

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(talk to specific slide details)



FinCEN SAR XML: File Layout

Overall File Organization (cont.)

- Each FinCEN SAR activity in the batch must include a separate **Party** element for the following:
 1. Transmitter
 2. Transmitter Contact
 3. Filing Institution
 4. Designated Contact Office
 5. Law Enforcement Agency (if any)
 6. Law Enforcement Name (if any)
 7. Financial Institution(s) Where Activity Occurred
 8. Branch(s) Where Activity Occurred (if any)
 9. Subject(s)
 10. Institution Where Account is Held (if reporting account information related to a subject)




```

graph LR
    Party[Party] --- PartyName[PartyName 0..100]
    Party --- Address[Address 0..99]
    Party --- PhoneNumber[PhoneNumber 0..99]
    Party --- PartyIdentification[PartyIdentification 0..101]
    Party --- OrgClass[OrganizationClassificationType S... 0..15]
    Party --- PartyOccupationBusiness[PartyOccupationBusiness]
    Party --- ElectronicAddress[ElectronicAddress 0..198]
    Party --- PartyAssociation[PartyAssociation 0..99]
    Party --- PartyAccountAssociation[PartyAccountAssociation]
            
```

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(talk to specific slide details)



FinCEN SAR XML: File Layout

Overall File Organization (cont.)

- Among the various sub-elements to the Activity element, the SuspiciousActivity element is used to identify critical details about the suspicious activity, such as the total amount involved and the type(s) of suspicious activity associated with the FinCEN SAR.
- Within this element is the sub-element <SuspiciousActivityClassification>, which must be recorded at least once per FinCEN SAR (but no more than 99 total). This element corresponds with Part II (Items 32-42) of the FinCEN SAR and identifies the type(s) and subtype(s) of suspicious activity involved, such as:
 - Structuring > Transaction(s) below CTR threshold
 - Terrorist financing > Known or suspended terrorist/terrorist group

SuspiciousActivity


...

SuspiciousActivityClassification

1..99

(talk to specific slide details)

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FinCEN SAR XML: Element Definition

Complex Elements

- A **complex** element is a container element for one or more sub-elements. Sub-elements may be *complex* elements or *simple* element (i.e. elements that do not contain sub-elements).
- The **Activity** element is an example of a complex element. It contains multiple sub-elements consisting of simple and complex elements. The order in which these sub-elements must be recorded are displayed in the element Description.

Element Name:	Activity	minOccurs:	1	maxOccurs:	unbounded																																																				
Description:	<p>Activity (header). This is the container for all information related to the FinCEN SAR. The first <Activity> element in the batch file must directly follow the <FormTypeCode> element. The batch must contain at least one occurrence of this element. There is no maximum occurrence value set for this element; however, the total size of the batch file must not exceed 60MB. The following sub-elements are associated with this element:</p> <table> <tr> <th>Name</th><th>minOccurs</th><th>maxOccurs</th><th>Category</th></tr> <tr> <td>EfilingPriorDocumentNumber</td><td>0</td><td>1</td><td>Simple</td></tr> <tr> <td>FilingDateText</td><td>1</td><td>1</td><td>Simple</td></tr> <tr> <td>FilingInstitutionNotetoFinCEN</td><td>0</td><td>1</td><td>Simple</td></tr> <tr> <td>ActivityAssociation</td><td>1</td><td>1</td><td>Complex</td></tr> <tr> <td>ActivitySupportDocument</td><td>0</td><td>1</td><td>Complex</td></tr> <tr> <td>Party</td><td>6</td><td>1203</td><td>Complex</td></tr> <tr> <td>SuspiciousActivity</td><td>1</td><td>1</td><td>Complex</td></tr> <tr> <td>ActivityIPAddress</td><td>0</td><td>99</td><td>Complex</td></tr> <tr> <td>CyberEventIndicators</td><td>0</td><td>99</td><td>Complex</td></tr> <tr> <td>Assets</td><td>0</td><td>31</td><td>Complex</td></tr> <tr> <td>AssetsAttribute</td><td>0</td><td>396</td><td>Complex</td></tr> <tr> <td>ActivityNarrativeInformation</td><td>1</td><td>1</td><td>Complex</td></tr> </table>	Name	minOccurs	maxOccurs	Category	EfilingPriorDocumentNumber	0	1	Simple	FilingDateText	1	1	Simple	FilingInstitutionNotetoFinCEN	0	1	Simple	ActivityAssociation	1	1	Complex	ActivitySupportDocument	0	1	Complex	Party	6	1203	Complex	SuspiciousActivity	1	1	Complex	ActivityIPAddress	0	99	Complex	CyberEventIndicators	0	99	Complex	Assets	0	31	Complex	AssetsAttribute	0	396	Complex	ActivityNarrativeInformation	1	1	Complex				
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Assets	0	31	Complex																																																						
AssetsAttribute	0	396	Complex																																																						
ActivityNarrativeInformation	1	1	Complex																																																						
Attribute(s)	<p>The following attributes must be recorded for this element:</p> <table> <tr> <th>Name</th><th>Description</th></tr> <tr> <td>SeqNum</td><td>The value recorded for this attribute must be numeric and unique. It may contain any numeric value up to 19 characters in length.</td></tr> </table>	Name	Description	SeqNum	The value recorded for this attribute must be numeric and unique. It may contain any numeric value up to 19 characters in length.																																																				
Name	Description																																																								
SeqNum	The value recorded for this attribute must be numeric and unique. It may contain any numeric value up to 19 characters in length.																																																								
Parent Element:	EfilingBatchXML																																																								
Element Restriction(s):	Required. This element must be recorded.																																																								
Value Restriction(s):	N/A																																																								
Remarks:	<p>The batch submission will be rejected if any of the following conditions are true:</p> <ul style="list-style-type: none"> The element is not recorded. The element is missing a "SeqNum" attribute. The element contains a "SeqNum" attribute with a duplicate or invalid value. 																																																								
Example:	<pre><fc2:Activity SeqNum="1"> <fc2:EfilingPriorDocumentNumber>31000000000001</fc2:EfilingPriorDocumentNumber> <fc2:FilingDateText>20171101</fc2:FilingDateText> <fc2:FilingInstitutionNotetoFinCEN>Filing institution note to FinCEN</fc2:FilingInstitutionNotetoFinCEN> <fc2:ActivityAssociation SeqNum="2"></pre>																																																								

(talk to specific slide details)



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FinCEN SAR XML: Element Definition

Simple Elements

- The following elements are examples of simple elements within the Activity element:

Element Name:	EfilingPriorDocumentNumber	minOccurs:	0	maxOccurs:	1
Description:	Prior report BSA Identifier (number). This element identifies the BSA Identifier (BSA ID) of the previously-filed FinCEN SAR when filing a correction/amendment and/or a continuing activity report. This element corresponds with the following item(s): <ul style="list-style-type: none"> 1e. Prior report BSA Identification Number Please refer to Attachment C for additional information regarding the above item(s).				
Attribute(s):	n/a				
Parent Element:	Activity				
Element Restriction(s):	Conditionally Required. Record this element when the FinCEN SAR being filed corrects/amends a prior report and/or is a continuing activity report; otherwise, do not record this element.				
Value Restriction(s):	The value provided must adhere to the following requirements: 14-digit numeric BSA ID (if known); 14 consecutive zeros, i.e. "00000000000000" (if the BSA ID is unknown).				
Remarks:	The batch submission will be accepted with warning if any of the following conditions are true: <ul style="list-style-type: none"> The element is recorded but without a value (i.e. the value is null). The value recorded does not equal 14 numeric characters. The element is not recorded and one or both of the following elements contains a "Y" value: <ul style="list-style-type: none"> <CorrectsAmendsPriorReportIndicator> <ContinuingActivityReportIndicator> The element is recorded (with a valid value) contains a "Y" value: <ul style="list-style-type: none"> <CorrectsAmendsPriorReportInd <ContinuingActivityReportIndica 				
Example:	<t2EfilingPriorDocumentNumber>31000000000000</t2EfilingPriorDocumentNumber>				

EFilingPriorDocumentNumber


The EFilingPriorDocumentNumber is an example of a *conditionally required* simple element. The condition upon which this element must be recorded is described in the *Element Restrictions* which requires this element to be recorded when the FinCEN SAR corrects/amends a prior report and/or is a continuing report).

FilingDateText

The FilingDateText is an example of a *required* simple element. This element must be recorded for each FinCEN SAR, as noted in the Element Restrictions.

Element Name:	FilingDateText	minOccurs:	1	maxOccurs:	1
Description:	Date filed (date). This element identifies the date in which the FinCEN SAR is being filed electronically through FinCEN's BSA E-Filing System. This element corresponds with the following item(s): <ul style="list-style-type: none"> 95. Date filed Please refer to Attachment C for additional information regarding the above item(s).				
Attribute(s):	n/a				
Parent Element:	Activity				
Element Restriction(s):	Required. This element must be recorded.				
Value Restriction(s):	The value provided must adhere to the following requirements: 8 numeric characters in the format YYYYMMDD where YYYY = year, MM = month, and DD = day. Single digit days or months must be prefixed by a zero.				
Remarks:	The batch submission will be rejected if any of the following conditions are true: <ul style="list-style-type: none"> The element is not recorded. The element is recorded but without a value (i.e. the value is null). The value recorded for the element is not a valid date in the format YYYYMMDD. The value recorded for the element is a date greater than the current date or less than January 1, 2000. 				
Example:	<t2FilingDateText>20171101</t2FilingDateText>				

(talk to specific slide details)



FinCEN SAR XML: Field Mapping

Element to Field Mapping

- Most elements within the batch map to a specific field on the FinCEN SAR.
- The field # associated with each element is referenced in the element Description.
- Some elements map to a specific field while other map to multiple fields depending on certain factors such as the type of party being reported.

Element Name:	CorrectsAmendsPriorReportIndicator	minOccurs:	0	maxOccurs:	1
Description:	Corrects/Amends prior report (indicator). This element declares that the FinCEN SAR being filed corrects or amends a previously-filed FinCEN SAR. This element corresponds with the following item(s): <ul style="list-style-type: none"> 1b. Correct/Amend prior report Please refer to Attachment C for additional information regarding the above item(s).				
Attribution:	n/a				
Parent Element:	ActivityAssociation				

Element Name:	OrganizationClassificationTypeSubtype	minOccurs:	0	maxOccurs:	15																																								
Description:	Institution type/subtype (header). This is the container form information about the type and subtype of institution associated with the party. The following sub-element is associated with this element: <div> Activity party type code definitions 30 = Filing Institution 34 = Financial Institution Where Activity Occurred </div> <ol style="list-style-type: none"> Filing Institution Information: Type of financial institution (Required FinCEN SAR Part IV, Items 79-80) <table border="1"> <thead> <tr> <th>Name</th> <th>minOccurs</th> <th>maxOccurs</th> <th>Content</th> </tr> </thead> <tbody> <tr> <td>OrganizationSubtypeID (Item 80a-n, z)</td> <td>0</td> <td>1</td> <td>Simple</td> </tr> <tr> <td>OrganizationTypeID (Item 79a-g, z)</td> <td>1</td> <td>1</td> <td>Simple</td> </tr> <tr> <td>OtherOrganizationSubTypeText (Item 80z)</td> <td>0</td> <td>1</td> <td>Simple</td> </tr> <tr> <td>OtherOrganizationTypeText (Item 79z)</td> <td>0</td> <td>1</td> <td>Simple</td> </tr> </tbody> </table> Financial Institution Where Activity Occurred: Type of financial institution (Required FinCEN SAR Part III, Items 51, 53-54) <table border="1"> <thead> <tr> <th>Name</th> <th>minOccurs</th> <th>maxOccurs</th> <th>Content</th> </tr> </thead> <tbody> <tr> <td>OrganizationSubtypeID (Items 53a-c, z / 54a-k, z)</td> <td>0</td> <td>1</td> <td>Simple</td> </tr> <tr> <td>OrganizationTypeID (Item 51a-g, z)</td> <td>1</td> <td>1</td> <td>Simple</td> </tr> <tr> <td>OtherOrganizationSubTypeText (Items 53z / 54z)</td> <td>0</td> <td>1</td> <td>Simple</td> </tr> <tr> <td>OtherOrganizationTypeText (Item 51z)</td> <td>0</td> <td>1</td> <td>Simple</td> </tr> </tbody> </table> 					Name	minOccurs	maxOccurs	Content	OrganizationSubtypeID (Item 80a-n, z)	0	1	Simple	OrganizationTypeID (Item 79a-g, z)	1	1	Simple	OtherOrganizationSubTypeText (Item 80z)	0	1	Simple	OtherOrganizationTypeText (Item 79z)	0	1	Simple	Name	minOccurs	maxOccurs	Content	OrganizationSubtypeID (Items 53a-c, z / 54a-k, z)	0	1	Simple	OrganizationTypeID (Item 51a-g, z)	1	1	Simple	OtherOrganizationSubTypeText (Items 53z / 54z)	0	1	Simple	OtherOrganizationTypeText (Item 51z)	0	1	Simple
Name	minOccurs	maxOccurs	Content																																										
OrganizationSubtypeID (Item 80a-n, z)	0	1	Simple																																										
OrganizationTypeID (Item 79a-g, z)	1	1	Simple																																										
OtherOrganizationSubTypeText (Item 80z)	0	1	Simple																																										
OtherOrganizationTypeText (Item 79z)	0	1	Simple																																										
Name	minOccurs	maxOccurs	Content																																										
OrganizationSubtypeID (Items 53a-c, z / 54a-k, z)	0	1	Simple																																										
OrganizationTypeID (Item 51a-g, z)	1	1	Simple																																										
OtherOrganizationSubTypeText (Items 53z / 54z)	0	1	Simple																																										
OtherOrganizationTypeText (Item 51z)	0	1	Simple																																										

(talk to specific slide details)

FinCEN SAR XML Example

FinCEN SAR XML batch file containing one FinCEN SAR:

Root element, which includes the batch count attributes (e.g. TotalAmount)

Declare what type of report this batch is associated with (SARX = FinCEN SAR)

Beginning of the FinCEN SAR

"Filing Institution Note to FinCEN" (New Field)

Container element for "Type of Filing"

Container element for "Supporting Document" file name

Various party type elements associated with Transmitter, Filing Institution, Subject, etc..

Container element regarding the amount, date range, and type(s) of suspicious activity

Various container elements associated with specific details regarding the suspicious activity

Container elements for the FinCEN SAR "Narrative" description


```

1  <?xml version="1.0" encoding="UTF-8"?>
2  <!-- edited with XMLSpy v2012 rel. 2 sp1 (http://www.altova.com) by FinCEN (US Treasury - FinCEN) -->
3  <dc2:EFilingBatchXML ActivityCount="1" TotalAmount="40000" PartyCount="2" ActivityAttachmentCount="
4  https://www.fincen.gov/base/EF1_SARXBatchSchema.xsd" xmlns:xsi="http://www.w3.org/2001/XMLSchema
5  <dc2:FormTypeCode>SARX</dc2:FormTypeCode>
6  <dc2:Activity SeqNum="1">
7    <dc2:EFilingPriorDocumentNumber>31000000000001</dc2:EFilingPriorDocumentNumber>
8    <dc2:FilingDateText>20180126</dc2:FilingDateText>
9    <dc2:FilingInstitutionNotesFinCEN>Note to FinCEN</dc2:FilingInstitutionNotesFinCEN>
10   <dc2:ActivityAssociation SeqNum="2">
11     <dc2:ActivitySupportDocument SeqNum="3">
12       <dc2:Party SeqNum="4">
13         <dc2:Party SeqNum="10">
14         <dc2:Party SeqNum="12">
15         <dc2:Party SeqNum="22">
16         <dc2:Party SeqNum="24">
17         <dc2:Party SeqNum="27">
18         <dc2:Party SeqNum="30">
19         <dc2:Party SeqNum="45">
20         <dc2:Party SeqNum="50">
21         <dc2:Party SeqNum="78">
22         <dc2:SuspiciousActivity SeqNum="81">
23         <dc2:ActivityAddress SeqNum="84">
24         <dc2:ActivityAddress SeqNum="85">
25         <dc2:CyberEventIndicators SeqNum="86">
26         <dc2:CyberEventIndicators SeqNum="87">
27         <dc2:CyberEventIndicators SeqNum="88">
28         <dc2:Assets SeqNum="89">
29         <dc2:Assets SeqNum="90">
30         <dc2:Assets SeqNum="91">
31         <dc2:Assets SeqNum="92">
32         <dc2:AssetsAttribute SeqNum="93">
33         <dc2:AssetsAttribute SeqNum="94">
34         <dc2:AssetsAttribute SeqNum="95">
35         <dc2:ActivityNarrativeInformation SeqNum="96">
36         <dc2:ActivityNarrativeInformation SeqNum="97">
37       </dc2:Activity>
38     </dc2:ActivityAssociation>
39   </dc2:Activity>
40 </dc2:EFilingBatchXML>

```

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(talk to specific slide details)



FinCEN SAR XML Example

Transmitter

This is the person (individual or entity) handling the data accumulation and formatting of the batch file. Each FinCEN SAR Activity element in the batch must include a Party element that identifies the batch transmitter. The batch transmitter should be identical for each FinCEN SAR. There must be only one occurrence of this party for each FinCEN SAR Activity in the batch.

```


</fc2:Party SeqNum="4">
  <l-Transmitter Information-->
    <fc2:ActivityPartyTypeCode>35</fc2:ActivityPartyTypeCode>
    <fc2:PartyName SeqNum="5">
      <l-Transmitter Information: Legal name-->
        <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
        <fc2:RawPartyFullName>Transmitter name</fc2:RawPartyFullName>
      </fc2:PartyName>
      <fc2:Address SeqNum="6">
        <l-Transmitter Information: Address-->
          <fc2:RawCityText>Richmond</fc2:RawCityText>
          <fc2:RawCountryCodeText>US</fc2:RawCountryCodeText>
          <fc2:RawStateCodeText>VA</fc2:RawStateCodeText>
          <fc2:RawStreetAddress1Text>123 Transmitter Road</fc2:RawStreetAddress1Text>
          <fc2:RawZipCode>22113</fc2:RawZipCode>
        </fc2:Address>
        <fc2:PhoneNumber SeqNum="7">
          <l-Transmitter Information: Telephone number-->
            <fc2:PhoneNumberText>7217894455</fc2:PhoneNumberText>
          </fc2:PhoneNumber>
          <fc2:PartyIdentification SeqNum="8">
            <l-Transmitter Information: TIN-->
              <fc2:PartyIdentificationNumberText>458985215</fc2:PartyIdentificationNumberText>
              <fc2:PartyIdentificationTypeCode>4</fc2:PartyIdentificationTypeCode>
            </fc2:PartyIdentification>
            <fc2:PartyIdentification SeqNum="9">
              <l-Transmitter Information: TCC-->
                <fc2:PartyIdentificationNumberText>PBSA1234</fc2:PartyIdentificationNumberText>
                <fc2:PartyIdentificationTypeCode>28</fc2:PartyIdentificationTypeCode>
              </fc2:PartyIdentification>
            </fc2:Party>
          </fc2:Party SeqNum="10">
            <l-Transmitter Contact-->
              <fc2:ActivityPartyTypeCode>37</fc2:ActivityPartyTypeCode>
              <fc2:PartyName SeqNum="11">
                <l-Transmitter Contact: Legal name-->
                  <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
                  <fc2:RawPartyFullName>Transmitter contact name</fc2:RawPartyFullName>
                </fc2:PartyName>
              </fc2:Party>
            </fc2:Party>
          </fc2:Party>
        
```

Transmitter Contact

This is the official contact for the transmitter. Each FinCEN SAR Activity element in the batch must include a Party element that identifies the point of contact for the batch transmitter. The transmitter contact should be identical for each FinCEN SAR. There must be only one occurrence of this party for each FinCEN SAR Activity in the batch.

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(talk to specific slide details)



FinCEN SAR XML Example

LE Contact Agency

This is the law enforcement agency (if any) that has been informed of the suspicious activity. There may only be one occurrence of this party for each FinCEN SAR Activity in the batch. This party corresponds with Part IV (Item 89) of the FinCEN SAR.

```

<fc2:Party SeqNum="22">
  <l-Part IV (Item 89). Filing Institution Contact Information-->
  <fc2:ActivityPartyTypeCode>18</fc2:ActivityPartyTypeCode>
  <fc2:PartyName SeqNum="23">
    <l-Part IV (Item 89). LE contact agency-->
    <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
    <fc2:RawPartyFullName>LE contact agency name</fc2:RawPartyFullName>
  </fc2:PartyName>
</fc2:Party>

```

LE Contact Name/Phone

This is the person at law enforcement agency (if any) contacted regarding the suspicious activity. There may only be one occurrence of this party for each FinCEN SAR Activity in the batch. This party corresponds with Part IV (Items 90-92) of the FinCEN SAR.

```

<fc2:Party SeqNum="24">
  <l-Part IV (Items 90-91). Filing Institution Contact Information-->
  <fc2:ActivityPartyTypeCode>19</fc2:ActivityPartyTypeCode>
  <fc2:ContactDateText>20180120</fc2:ContactDateText>
  <fc2:PartyName SeqNum="25">
    <l-Part IV (Item 90). LE contact name-->
    <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
    <fc2:RawPartyFullName>LE contact name</fc2:RawPartyFullName>
  </fc2:PartyName>
  <fc2:PhoneNumber SeqNum="26">
    <l-Part IV (Item 91). LE contact phone number (Include Area Code), Ext.-->
    <fc2:PhoneNumberExtensionText>5432</fc2:PhoneNumberExtensionText>
    <fc2:PhoneNumberText>7039051234</fc2:PhoneNumberText>
  </fc2:PhoneNumber>
</fc2:Party>

```

Designated Contact Office Name/Phone


This is the administrative office that should be contacted to obtain additional information about the FinCEN SAR. There must be only one occurrence of this party for each FinCEN SAR Activity in the batch. This party corresponds with Part IV (Items 93-94) of the FinCEN SAR.

```

<fc2:Party SeqNum="27">
  <l-Part IV (Items 93-94). Filing Institution Contact Information-->
  <fc2:ActivityPartyTypeCode>8</fc2:ActivityPartyTypeCode>
  <fc2:PartyName SeqNum="28">
    <l-Part IV (Item 93). Designated contact office-->
    <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
    <fc2:RawPartyFullName>Designated contact office name</fc2:RawPartyFullName>
  </fc2:PartyName>
  <fc2:PhoneNumber SeqNum="29">
    <l-Part IV (Item 94). Designated contact phone number (Include Area Code), Ext.-->
    <fc2:PhoneNumberExtensionText>1234</fc2:PhoneNumberExtensionText>
    <fc2:PhoneNumberText>4157653838</fc2:PhoneNumberText>
  </fc2:PhoneNumber>
</fc2:Party>

```

(talk to specific slide details)



FinCEN SAR XML Example

Financial Institution Where Activity Occurred

This is the financial institution where the suspicious activity occurred. There must be at least one occurrence (not to exceed 99) of this party for each FinCEN SAR Activity in the batch. This party corresponds with Part III (Items 51-67, 69a).

If a branch location associated with the financial institution where activity occurred is also involved, information about the branch should be recorded in a separate party element under the parent element <PartyAssociation>


See next slide for the Branch sample...

```

<fc2:Party SeqNum="30">
  <!--Part III (Items 51-74): Financial Institution Where Activity Occurred (1 of 2)-->
  <fc2:ActivityPartyTypeCode>34</fc2:ActivityPartyTypeCode>
  <fc2:LossToFinancialAmountText>15000</fc2:LossToFinancialAmountText>
  <fc2:PayLocationIndicator>Y</fc2:PayLocationIndicator>
  <fc2:PrimaryRegulatorTypeCode>4</fc2:PrimaryRegulatorTypeCode>
  <fc2:PartyName SeqNum="31">
    <!--Part III (Item 57): Legal name of financial institution-->
    <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
    <fc2:RawPartyFullName>Union Bank of California</fc2:RawPartyFullName>
  </fc2:PartyName>
  <fc2:PartyName SeqNum="32">
    <!--Part III (Item 58): Alternate Name, e.g. AKA - individual or trade name, DBA - entity-->
    <fc2:PartyNameTypeCode>DBA</fc2:PartyNameTypeCode>
    <fc2:RawPartyFullName>U.B. Cal</fc2:RawPartyFullName>
  </fc2:PartyName>
  <fc2:Address SeqNum="33">
    <!--Part III (Items 61-65): Address, City, State, ZIP/Postal Code, Country-->
    <fc2:RawCityText>Los Angeles</fc2:RawCityText>
    <fc2:RawCountryCodeText>US</fc2:RawCountryCodeText>
    <fc2:RawStateCodeText>CA</fc2:RawStateCodeText>
    <fc2:RawStreetAddress1Text>987 Rocky Road</fc2:RawStreetAddress1Text>
    <fc2:RawZipCode>87598</fc2:RawZipCode>
  </fc2:Address>
  <fc2:PartyIdentification SeqNum="34">
    <!--Part III (Items 59-60): TIN, TIN type-->
    <fc2:PartyIdentificationNumberText>458789856</fc2:PartyIdentificationNumberText>
    <fc2:PartyIdentificationTypeCode>2</fc2:PartyIdentificationTypeCode>
  </fc2:PartyIdentification>
  <fc2:PartyIdentification SeqNum="35">
    <!--Part III (Item 55): Financial institution identification: Number, Type-->
    <fc2:PartyIdentificationNumberText>5589887789</fc2:PartyIdentificationNumberText>
    <fc2:PartyIdentificationTypeCode>10</fc2:PartyIdentificationTypeCode>
  </fc2:PartyIdentification>
  <fc2:PartyIdentification SeqNum="36">
    <!--Part III (Item 66): Internal controlfile number-->
    <fc2:PartyIdentificationNumberText>4578959658</fc2:PartyIdentificationNumberText>
    <fc2:PartyIdentificationTypeCode>29</fc2:PartyIdentificationTypeCode>
  </fc2:PartyIdentification>
  <fc2:OrganizationClassificationTypeSubtype SeqNum="37">
    <!--Part III (Items 51, 53-54): Type of financial institution, Type of Securities and Futures institution or individual where activity occurred. In this example, the type of institution is Securities/Futures (5) and the subtype is Holding company (504). This is Securities and Futures institution subtype 1 of 1 for the institution-->
    <fc2:OrganizationSubtypeID>504</fc2:OrganizationSubtypeID>
    <fc2:OrganizationTypeID>5</fc2:OrganizationTypeID>
  </fc2:OrganizationClassificationTypeSubtype>
  <fc2:PartyAssociation SeqNum="38">

```

(talk to specific slide details)



FinCEN SAR XML Example

Subject

This is the subject involved in the suspicious activity. There must be at least one occurrence (not to exceed 999) of this party for each FinCEN SAR Activity in the batch. This party corresponds with Part I (Items 3-28) of the FinCEN SAR.


```

<fc2:Party SeqNum="50">
  <!--Part III (Items 3-27): Subject (1 of 2)-->
  <fc2:ActivityPartyTypeCode>33</fc2:ActivityPartyTypeCode>
  <fc2:AdmissionConfessionYesIndicator>Y</fc2:AdmissionConfessionYesIndicator>
  <fc2:FemaleGenderIndicator>Y</fc2:FemaleGenderIndicator>
  <fc2:IndividualBirthDateText>19801025</fc2:IndividualBirthDateText>
  <fc2:PayeePlaceIndicator>Y</fc2:PayeePlaceIndicator>
  <fc2:PartyName SeqNum="51">
    <!--Part III (Items 4-7): Individual's last name or entity's legal name, First name, Middle name, Suffix-->
    <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
    <fc2:RawEntityIndividualLastName>Mann</fc2:RawEntityIndividualLastName>
    <fc2:RawIndividualFirstName>Will</fc2:RawIndividualFirstName>
    <fc2:RawIndividualMiddleName>Randy</fc2:RawIndividualMiddleName>
    <fc2:RawIndividualNameSuffixText>Junior</fc2:RawIndividualNameSuffixText>
  </fc2:PartyName>
  <fc2:PartyName SeqNum="52">
    <!--Part III (Item 5): Alternate name, e.g., AKA - individual or trade name, DBA - entity (1 of 2)-->
    <fc2:PartyNameTypeCode>AKA</fc2:PartyNameTypeCode>
    <fc2:RawPartyFullName>Willy Mann</fc2:RawPartyFullName>
  </fc2:PartyName>
  <fc2:PartyName SeqNum="53">
    <!--Part III (Item 9): Alternate name, e.g., AKA - individual or trade name, DBA - entity (2 of 2)-->
    <fc2:PartyNameTypeCode>AKA</fc2:PartyNameTypeCode>
    <fc2:RawPartyFullName>Willy Manning</fc2:RawPartyFullName>
  </fc2:PartyName>
  <fc2:Address SeqNum="54">
    <!--Part III (Items 11-15): Address, City, State, ZIP/Postal Code, Country Code (1 of 2)-->
    <fc2:RawCityText>Urbana</fc2:RawCityText>
    <fc2:RawCountryCodeText>US</fc2:RawCountryCodeText>
    <fc2:RawStateCodeText>MD</fc2:RawStateCodeText>
    <fc2:RawStreetAddress1Text>321 Turkey Way</fc2:RawStreetAddress1Text>
    <fc2:RawZIPCode>20888</fc2:RawZIPCode>
  </fc2:Address>
  <fc2:Address SeqNum="55">
    <!--Part III (Items 11-15): Address, City, State, ZIP/Postal Code, Country Code (2 of 2)-->
    <fc2:RawCityText>Darnestown</fc2:RawCityText>
    <fc2:RawCountryCodeText>US</fc2:RawCountryCodeText>
    <fc2:RawStateCodeText>MD</fc2:RawStateCodeText>
    <fc2:RawStreetAddress1Text>555 Rock Street</fc2:RawStreetAddress1Text>
    <fc2:RawZIPCode>20877</fc2:RawZIPCode>
  </fc2:Address>
  <fc2:PhoneNumber SeqNum="56">
    <!--Part III (20-21): Phone number, Type (R-Residence/home) (1 of 2)-->
    <fc2:PhoneNumberText>6194760276</fc2:PhoneNumberText>
    <fc2:PhoneNumberTypeCode>R</fc2:PhoneNumberTypeCode>
  </fc2:PhoneNumber>
  <fc2:PhoneNumber SeqNum="57">
    <!--Part III (20-21): Phone number, Ext., Type (W-Work) (2 of 2)-->
    <fc2:PhoneNumberExtensionText>5687</fc2:PhoneNumberExtensionText>
    <fc2:PhoneNumberText>3654289192</fc2:PhoneNumberText>
    <fc2:PhoneNumberTypeCode>W</fc2:PhoneNumberTypeCode>
  </fc2:PhoneNumber>

```

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(talk to specific slide details)



FinCEN SAR XML Example

Subject (cont.)


```

<fc2:PartyIdentification SeqNum="58">
  <!--Part III (Item 18). Form of identification for subject: Type (5=Driver's license/state ID), Number, Issuing State, Country (1 of 2)-->
  <fc2:OtherIssuerCountryText>US</fc2:OtherIssuerCountryText>
  <fc2:OtherIssuerStateText>CA</fc2:OtherIssuerStateText>
  <fc2:PartyIdentificationNumberText>660623559</fc2:PartyIdentificationNumberText>
  <fc2:PartyIdentificationTypeCode>5</fc2:PartyIdentificationTypeCode>
</fc2:PartyIdentification>
<fc2:PartyIdentification SeqNum="59">
  <!--Part III (Item 18). Form of identification for subject: Type (999=Other), Other description, Number, Issuing State, Country (2 of 2)-->
  <fc2:OtherIssuerCountryText>US</fc2:OtherIssuerCountryText>
  <fc2:OtherIssuerStateText>CA</fc2:OtherIssuerStateText>
  <fc2:OtherPartyIdentificationTypeText>Student ID</fc2:OtherPartyIdentificationTypeText>
  <fc2:PartyIdentificationNumberText>555558744898</fc2:PartyIdentificationNumberText>
  <fc2:PartyIdentificationTypeCode>999</fc2:PartyIdentificationTypeCode>
</fc2:PartyIdentification>
<fc2:PartyIdentification SeqNum="60">
  <!--Part III (Items 16-17). TIN, TIN type (1=SSN/ITIN)-->
  <fc2:PartyIdentificationNumberText>660623559</fc2:PartyIdentificationNumberText>
  <fc2:PartyIdentificationTypeCode>1</fc2:PartyIdentificationTypeCode>
</fc2:PartyIdentification>
<fc2:PartyOccupationBusiness SeqNum="61">
  <!--Part III (Item 10/10a). Occupation or type of business, NAICS Code-->
  <fc2:NAICSCode>7548</fc2:NAICSCode>
  <fc2:OccupationBusinessText>Mechanic</fc2:OccupationBusinessText>
</fc2:PartyOccupationBusiness>
<fc2:ElectronicAddress SeqNum="62">
  <!--Part III (Item 22). E-mail address (1 of 2)-->
  <fc2:ElectronicAddressText>will.mann@gmail.com</fc2:ElectronicAddressText>
  <fc2:ElectronicAddressTypeCode>E</fc2:ElectronicAddressTypeCode>
</fc2:ElectronicAddress>
<fc2:ElectronicAddress SeqNum="63">
  <!--Part III (Item 22). E-mail address (2 of 2)-->
  <fc2:ElectronicAddressText>will.mann2@gmail.com</fc2:ElectronicAddressText>
  <fc2:ElectronicAddressTypeCode>E</fc2:ElectronicAddressTypeCode>
</fc2:ElectronicAddress>

```

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(talk to specific slide details)



FinCEN SAR XML Example

Subject (cont.)


```

</fc2:ElectronicAddress SeqNum="64">
  <!--Part III (Item 22a). Website (URL) address (1 of 2)-->
  <fc2:ElectronicAddressText>https://www.will_mann.org</fc2:ElectronicAddressText>
  <fc2:ElectronicAddressTypeCode>U</fc2:ElectronicAddressTypeCode>
</fc2:ElectronicAddress>
<fc2:ElectronicAddress SeqNum="65">
  <!--Part III (Item 22a). Website (URL) address (2 of 2)-->
  <fc2:ElectronicAddressText>http://www.will_mann2.org</fc2:ElectronicAddressText>
  <fc2:ElectronicAddressTypeCode>U</fc2:ElectronicAddressTypeCode>
</fc2:ElectronicAddress>
<fc2:PartyAssociation SeqNum="66">
  <!--Part III (Items 24-26). Relationship of subject to institution listed in Part III or IV: Institution TIN, Relationship type,
  Status of relationship, Action date (1 of 2)-->
  <fc2:ActionTakenDateText>20170905</fc2:ActionTakenDateText>
  <fc2:DirectorIndicator>Y</fc2:DirectorIndicator>
  <fc2:ResignedIndicator>Y</fc2:ResignedIndicator>
  <fc2:SubjectRelationshipFinancialInstitutionTINText>458789856</fc2:SubjectRelationshipFinancialInstitutionTINText>
</fc2:PartyAssociation>
<fc2:PartyAssociation SeqNum="67">
  <!--Part III (Items 24-26). Relationship of subject to institution listed in Part III or IV: Institution TIN(Unknown, thus not
  recorded), Relationship type (2 of 2)-->
  <fc2:AgentIndicator>Y</fc2:AgentIndicator>
</fc2:PartyAssociation>

```

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(talk to specific slide details)



FinCEN SAR XML Example


Subject (cont.)

```

</fc2:PartyAccountAssociation SeqNum="68">
  <!--Part III (Item 27). Financial institution(s) TIN and account number(s) affected that are related to subject-->
  <fc2:PartyAccountAssociationTypeCode>7</fc2:PartyAccountAssociationTypeCode>
  <fc2:Party SeqNum="69">
    <!--Part III (Item 27). Institution (where account is held). TIN (1 of 2)-->
    <fc2:ActivityPartyTypeCode>41</fc2:ActivityPartyTypeCode>
    <fc2:PartyIdentification SeqNum="70">
      <!--Part III (Item 27). Institution TIN-->
      <fc2:PartyIdentificationNumberText>458789856</fc2:PartyIdentificationNumberText>
      <fc2:PartyIdentificationTypeCode>4</fc2:PartyIdentificationTypeCode>
    </fc2:PartyIdentification>
    <fc2:Account SeqNum="71">
      <!--Part III (Item 27). Institution (where account is held). Account number (1 of 2)-->
      <fc2:AccountNumberText>1502417873</fc2:AccountNumberText>
      <fc2:PartyAccountAssociation SeqNum="72">
        <!--Part III (Item 27). Institution (where account is held). Closed [account]? Yes-->
        <fc2:AccountClosedIndicator>Y</fc2:AccountClosedIndicator>
        <fc2:PartyAccountAssociationTypeCode>5</fc2:PartyAccountAssociationTypeCode>
      </fc2:PartyAccountAssociation>
    </fc2:Account>
    <fc2:Account SeqNum="73">
      <!--Part III (Item 27). Institution (where account is held). Account number (2 of 2)-->
      <fc2:AccountNumberText>5477887896</fc2:AccountNumberText>
      <fc2:PartyAccountAssociation SeqNum="74">
        <!--Part III (Item 27). Institution (where account is held). Closed [account]? No-->
        <fc2:AccountClosedIndicator>N</fc2:AccountClosedIndicator>
        <fc2:PartyAccountAssociationTypeCode>5</fc2:PartyAccountAssociationTypeCode>
      </fc2:PartyAccountAssociation>
    </fc2:Account>
  </fc2:Party>
  <fc2:Party SeqNum="75">
    <!--Part III (Item 27). Institution (where account is held). Non-US Financial institution, TIN (2 of 2)-->
    <fc2:ActivityPartyTypeCode>41</fc2:ActivityPartyTypeCode>
    <fc2:NonUSFinancialInstitutionIndicator>Y</fc2:NonUSFinancialInstitutionIndicator>
    <!--NOTE: Institution TIN is unknown; therefore, the PartyIdentification element is not recorded-->
    <fc2:Account SeqNum="76">
      <!--Part III (Item 27). Institution (where account is held). Account number (1 of 1)-->
      <fc2:AccountNumberText>6669988544</fc2:AccountNumberText>
      <fc2:PartyAccountAssociation SeqNum="77">
        <!--Part III (Item 27). Institution (where account is held). Closed [account]? Yes-->
        <fc2:AccountClosedIndicator>Y</fc2:AccountClosedIndicator>
        <fc2:PartyAccountAssociationTypeCode>5</fc2:PartyAccountAssociationTypeCode>
      </fc2:PartyAccountAssociation>
    </fc2:Account>
  </fc2:Party>
</fc2:PartyAccountAssociation>
  
```

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(talk to specific slide details)



FinCEN SAR XML Example

SuspiciousActivity

This element identifies information such as the total amount involved and the type of suspicious activity. There must only be one occurrence of this element for each FinCEN SAR Activity in the batch. This element corresponds with Part II (Items 29-31) of the FinCEN SAR.

+

SuspiciousActivityClassification

This element is the container for information about the specific type(s) and subtype(s) of suspicious activity, such as Structuring > "Transaction(s) below CTR threshold", Terrorist financing > "Known or suspended terrorist/terrorist group", etc. This element corresponds with Part II (Items 32-42) of the FinCEN SAR.

```

<fc2:SuspiciousActivity SeqNum="81">
  <!--Part II (Items 29-42). Suspicious Activity Information-->
  <fc2:SuspiciousActivityFromDateText>20171201</fc2:SuspiciousActivityFromDateText>
  <fc2:SuspiciousActivityToDateText>20171225</fc2:SuspiciousActivityToDateText>
  <fc2:TotalSuspiciousAmountText>40000</fc2:TotalSuspiciousAmountText>
  <fc2:SuspiciousActivityClassification SeqNum="82">
    <!--Part II (Items 32-42). Suspicious Activity Information: Structuring (1) / Transaction(s) below BSA recordkeeping threshold (113) (1 of 2)-->
    <fc2:SuspiciousActivitySubtypeID>113</fc2:SuspiciousActivitySubtypeID>
    <fc2:SuspiciousActivityTypeID>1</fc2:SuspiciousActivityTypeID>
  </fc2:SuspiciousActivityClassification>
  <fc2:SuspiciousActivityClassification SeqNum="83">
    <!--Part II (Items 32-42). Suspicious Activity Information: Cyber event (11) / Other (11999) / Other description (2 of 2)-->
    <fc2:OtherSuspiciousActivityTypeText>other cyber event description</fc2:OtherSuspiciousActivityTypeText>
    <fc2:SuspiciousActivitySubtypeID>11999</fc2:SuspiciousActivitySubtypeID>
    <fc2:SuspiciousActivityTypeID>11</fc2:SuspiciousActivityTypeID>
  </fc2:SuspiciousActivityClassification>
</fc2:SuspiciousActivity>

```


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(talk to specific slide details)

As the container for information about the details of the suspicious activity, this element identifies information such as the total amount involved and the type of suspicious activity. This element should be recorded after the final Party element is recorded for the FinCEN SAR. There must only be one occurrence of this element for each FinCEN SAR Activity in the batch. This element corresponds with Part II (Items 29-31) of the FinCEN SAR.

Within this element is the sub-element <SuspiciousActivityClassification>, which must be recorded at least once per FinCEN SAR (but no more than 99 total). This element is the container for information about the specific type(s) and subtype(s) of suspicious activity, such as Structuring > "Transaction(s) below CTR threshold", Terrorist financing > "Known or suspended terrorist/terrorist group", etc. This element corresponds with Part II (Items 32-42) of the FinCEN SAR.

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FinCEN SAR XML Example

Misc. Suspicious Activity Elements

The following elements and their associated sub-elements represent Part II Items 43-49 of the FinCEN SAR, such as the Activity IP address, Product type(s) involved, Instrument type(s)/payment mechanism(s) involved, Commodity type(s), etc.


```

<fc2:ActivityIPAddress SeqNum="84">
  <!--Part II (Item 43). IP address (1 of 2)-->
  <fc2:ActivityIPAddressDateText>20171205</fc2:ActivityIPAddressDateText>
  <fc2:ActivityIPAddressTimeStampText>05:13:55</fc2:ActivityIPAddressTimeStampText>
  <fc2:IPAddressText>166.123.216.61</fc2:IPAddressText>
</fc2:ActivityIPAddress>
<fc2:ActivityIPAddress SeqNum="85">
  <!--Part II (Item 43). IP address (Note: Date and Timestamp are unknown) (2 of 2)-->
  <fc2:IPAddressText>166.123.216.62</fc2:IPAddressText>
</fc2:ActivityIPAddress>
<fc2:CyberEventIndicators SeqNum="86">
  <!--Part II (Item 44). Cyber Event Indicators: Event type (1=Command and control IP address), Event value, Date, Timestamp (1 of 3)-->
  <fc2:CyberEventDateText>20171219</fc2:CyberEventDateText>
  <fc2:CyberEventIndicatorsTypeCode>1</fc2:CyberEventIndicatorsTypeCode>
  <fc2:CyberEventTimeStampText>11:05:45</fc2:CyberEventTimeStampText>
  <fc2:EventValueText>166.123.216.61</fc2:EventValueText>
</fc2:CyberEventIndicators>
<fc2:CyberEventIndicators SeqNum="87">
  <!--Part II (Item 44). Cyber Event Indicators: Event type (6=Suspicious e-mail address), Event value (2 of 3)-->
  <fc2:CyberEventIndicatorsTypeCode>1</fc2:CyberEventIndicatorsTypeCode>
  <fc2:EventValueText>suspiciousemail@email.com</fc2:EventValueText>
</fc2:CyberEventIndicators>
<fc2:CyberEventIndicators SeqNum="88">
  <!--Part II (Item 44). Cyber Event Indicators: Event type (11=Other), Description of "other" Event type, Event value (3 of 3)-->
  <fc2:CyberEventIndicatorsTypeCode>11</fc2:CyberEventIndicatorsTypeCode>
  <fc2:CyberEventTypeOtherText>other event description</fc2:CyberEventTypeOtherText>
  <fc2:EventValueText>other event value</fc2:EventValueText>
</fc2:CyberEventIndicators>
<fc2:Assets SeqNum="89">
  <!--Part II (Item 45). Product type(s) involved in the suspicious activity: 5=Product, Type (2=Bonds/Notes) (1 of 2)-->
  <fc2:AssetSubtypeID>2</fc2:AssetSubtypeID>
  <fc2:AssetTypeID>5</fc2:AssetTypeID>
</fc2:Assets>

```

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FinCEN SAR XML Example

Misc. Suspicious Activity Elements (cont.)


```

<fc2:Assets SeqNum="90">
  <l-Part II (Item 45). Product type(s) involved in the suspicious activity: 5=Product, Type (30=Other),
  Description of "other" type (2 of 2)-->
  <fc2:AssetSubtypeID>30</fc2:AssetSubtypeID>
  <fc2:AssetTypeID>5</fc2:AssetTypeID>
  <fc2:OtherAssetSubtypeText>other product type description</fc2:OtherAssetSubtypeText>
</fc2:Assets>
<fc2:Assets SeqNum="91">
  <l-Part II (Item 46). Instrument type(s)/payment mechanism(s) involved in the suspicious activity:
  6=Instrument/Payment mechanism, Type (33=Funds transfer) (1 of 2)-->
  <fc2:AssetSubtypeID>33</fc2:AssetSubtypeID>
  <fc2:AssetTypeID>6</fc2:AssetTypeID>
</fc2:Assets>
<fc2:Assets SeqNum="92">
  <l-Part II (Item 46). Instrument type(s)/payment mechanism(s) involved in the suspicious activity:
  6=Instrument/Payment mechanism, Type (39=U.S. Currency) (2 of 2)-->
  <fc2:AssetSubtypeID>39</fc2:AssetSubtypeID>
  <fc2:AssetTypeID>6</fc2:AssetTypeID>
</fc2:Assets>
<fc2:AssetsAttribute SeqNum="93">
  <l-Part II (Item 47). Commodity type: 2=Commodity type, Description of commodity type (1 of 2)-->
  <fc2:AssetAttributeDescriptionText>Commodity type description</fc2:AssetAttributeDescriptionText>
  <fc2:AssetAttributeTypeID>2</fc2:AssetAttributeTypeID>
</fc2:AssetsAttribute>
<fc2:AssetsAttribute SeqNum="94">
  <l-Part II (Item 47). Commodity type: 2=Commodity type, Description of commodity type (2 of 2)-->
  <fc2:AssetAttributeDescriptionText>Commodity type description</fc2:AssetAttributeDescriptionText>
  <fc2:AssetAttributeTypeID>2</fc2:AssetAttributeTypeID>
</fc2:AssetsAttribute>
<fc2:AssetsAttribute SeqNum="95">
  <l-Part II (Item 49). Market where traded: 4=Market where traded, Market code (1 of 1)-->
  <fc2:AssetAttributeDescriptionText>555</fc2:AssetAttributeDescriptionText>
  <fc2:AssetAttributeTypeID>4</fc2:AssetAttributeTypeID>
</fc2:AssetsAttribute>

```

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FinCEN SAR XML: Attachments

Support Documentation:

- Attachments are supported with the updated FinCEN SAR
- Attachment restrictions are no different with XML than with ASCII today:
 - Attachments must be a Microsoft-Excel-compatible comma separate values (CSV) file format
 - A CSV attachment cannot exceed 1MB
 - Only one CSV attachment may be associate with each FinCEN SAR
- ASCII vs XML reporting of attachments: in XML, the attachment name must be referenced within the batch file, for example:



```

<fc2:ActivitySupportDocument SeqNum="3">
  <!--Part V: Supporting Documentation-->
  <fc2:OriginalAttachmentFileName>SARAttachment20180201.csv</fc2:OriginalAttachmentFileName>
</fc2:ActivitySupportDocument>

```
- Activity SeqNum value must be appended to the CSV attachment file name
 For example: 1_SARAttachment20180201.csv
 The "1" in this example indicates that within the FinCEN SAR XML batch, Activity SeqNum="1" contains the <OriginalAttachmentFileName> element with the value of "SARAttachment20180201.csv"
- All attachments must be compiled in a single ZIP file before attaching to the batch form along with the FinCEN SAR XML batch file.
- Please refer to **Attachment E – Supporting Documentation (Attachments)** within the User Guide for additional details.

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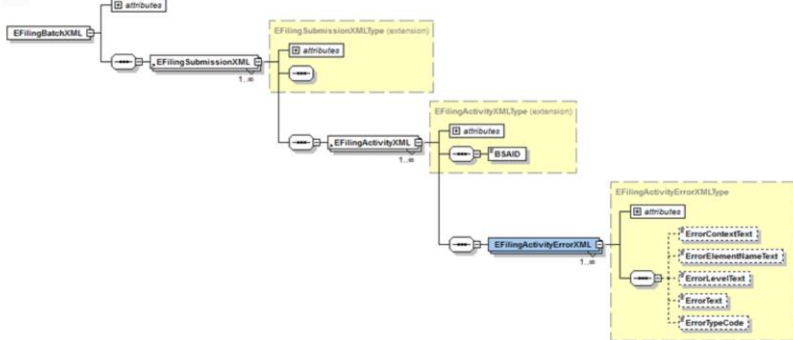
- FinCEN SAR filers continue to have the option to attach supporting documentation with their discrete or batch submission in XML format
- FinCEN SAR filers may, but are not required to, attach a Microsoft Excel-compatible comma separated values (CSV) file (no larger than 1 MB) providing details in tabular form of transactions subject to the suspicious activity discussed in Part V “Narrative Description” of the FinCEN SAR.
- The major difference between ASCII and XML reporting of attachments is that in the new SAR XML format, the actual attachment name must be referenced with the FinCEN SAR Activity element (see example).
- Filers must append the SeqNum value of the corresponding FinCEN SAR Activity element in the batch file to the CSV attachment file name (see example).
- All attachments must be compiled in a single ZIP file before attaching to the batch form along with the FinCEN SAR XML batch file.



FinCEN SAR XML: Acknowledgements

XML Acknowledgement Processing:


- The FinCEN BSA Acknowledgement schema is used by all XML form types currently available on the BSA E-Filing System. To access this schema, click on the following link:
https://www.fincen.gov/sites/default/files/schema/base/EFL_BatchAcknowledgementSchema.xsd
- The following diagram provides an overview of the XML acknowledgment file structure, beginning with the EFileBatchXML element:



The diagram illustrates the hierarchical structure of an XML acknowledgment file. It begins with the **EFileBatchXML** element, which contains an **attributes** block and a sequence of **EFileSubmissionXML** elements (indicated by a '1..n' cardinality). Each **EFileSubmissionXML** element contains an **attributes** block and a sequence of **EFileActivityXML** elements (indicated by a '1..n' cardinality). Each **EFileActivityXML** element contains an **attributes** block, a **BSAID** element, and a sequence of **EFileActivityErrorXML** elements (indicated by a '1..n' cardinality). The **EFileActivityErrorXML** element contains an **attributes** block and a sequence of error elements: **ErrorCodeText**, **ErrorElementNameText**, **ErrorLevelText**, **ErrorText**, and **ErrorTypeCode**.

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- The FinCEN BSA Acknowledgement schema is used by all XML form types currently available on the BSA E-Filing System. To access this schema, click on the link displayed here:
https://www.fincen.gov/sites/default/files/schema/base/EFL_BatchAcknowledgementSchema.xsd
- The following diagram provides an overview of the XML acknowledgment file structure, beginning with the EFileBatchXML element



FinCEN SAR XML: Acknowledgements

XML Acknowledgement Processing: Example

The example above consists of three (3) FinCEN SAR activities based on the original FinCEN SAR batch submission:

- Each FinCEN SAR from the original batch submission is associated with a <EfilngActivityXML> element
- Each FinCEN SAR receives a unique BSA Identifier (BSA ID)
- FinCEN SAR (BSA ID: 31000055053784) contains two errors (C21 & C4)
- FinCEN SAR (BSA ID: 31000055053785) contains no errors
- FinCEN SAR (BSA ID: 31000055053786) contains no errors


```

<?xml version="1.0" encoding="UTF-8"?>
<EfilngBatchXML StatusCode="A" SeqNum="1" xmlns="www.fincen.gov/base">
  <EfilngSubmissionXML StatusCode="A" SeqNum="1">
    <EfilngActivityXML SeqNum="1">
      <BSAID>31000055053784</BSAID>
      <EfilngActivityErrorXML SeqNum="1">
        <ErrorContextText>EfilngBatchXML/Activity(1)/Party(25)/PartyIdentification(49)/PartyIdentificationNumberText</ErrorContextText>
        <ErrorElementNameText>PartyIdentificationNumberText</ErrorElementNameText>
        <ErrorLevelText>WARN</ErrorLevelText>
        <ErrorText>The value recorded for the EIN or SSN/ITIN is an invalid number string.</ErrorText>
        <ErrorTypeCode>C21</ErrorTypeCode>
      </EfilngActivityErrorXML>
      <EfilngActivityErrorXML SeqNum="2">
        <ErrorContextText>EfilngBatchXML/Activity(1)/Party(78)/PartyName(84)/RawIndividualFirstName</ErrorContextText>
        <ErrorElementNameText>RawIndividualFirstName</ErrorElementNameText>
        <ErrorLevelText>WARN</ErrorLevelText>
        <ErrorText>The element is not recorded or does not contain a value for an individual Subject and unknown is not indicated.</ErrorText>
        <ErrorTypeCode>C4</ErrorTypeCode>
      </EfilngActivityErrorXML>
    </EfilngActivityXML>
    <EfilngActivityXML SeqNum="2">
      <BSAID>31000055053785</BSAID>
      <EfilngActivityErrorXML SeqNum="1">
      </EfilngActivityErrorXML>
    </EfilngActivityXML>
    <EfilngActivityXML SeqNum="3">
      <BSAID>31000055053786</BSAID>
      <EfilngActivityErrorXML SeqNum="1">
      </EfilngActivityErrorXML>
    </EfilngActivityXML>
  </EfilngSubmissionXML>
</EfilngBatchXML>

```

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FinCEN SAR XML: SDTM Filing

Secure Direct Transfer Mode (SDTM)


- Secure, system to system mechanism for FinCEN SAR XML batch submissions
- Existing SDTM connections can be used for FinCEN SAR XML
- Must be a single file containing the FinCEN SAR XML batch data:
 - **Submission type:** SARXST
 - **Date/Time:** This will be a date-time stamp to guarantee filename uniqueness
 - Year = YYYY
 - Month = MM
 - Day = DD
 - Hour = hh
 - Minute = mm
 - Second = ss
 - **Organization name:** Custom naming by the submitting organization (e.g. "ABCPreparingFirm")
 - **Extension:** xml
 - **Example FinCEN SAR XML batch file name:** SARXST.20170609153015.ABCPreparingFirm.xml
 - **Corresponding FinCEN SAR XML batch Acknowledgement file name:** This file name will match the corresponding input FinCEN SAR XML batch file name with the text "*.ACKED" appended to the end. For example:
SARXST.20170609153015.ABCPreparingFirm.xml.ACKED
- SDTM batches with supporting documentation must submit a single ZIP file consisting of:
 - Attachments ZIP file
 - FinCEN SAR XML batch XML file

NOTE: The SDTM ZIP file name must begin with "SARXST" and end with ".ZIP" (e.g. SARXST.SARXML_batch.ZIP)
- For immediate batch validation results upon submission, an optional xml file will be provided upon request.
 - This file includes all batch warnings and/or fatal errors generated by FinCEN based on the content of the batch file.

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- SDTM allows for a secure, system to system mechanism for transferring batch submissions from your organization's internal server to the BSA E-Filing server. FinCEN will continue to provide the ability for filers to submit the FinCEN SAR XML batch file securely via the Internet using a VPN device or Connect:Direct software.
- Filers can continue to use their existing SDTM connections for transmission of their FinCEN SAR XML batch files
- For filers using this option for filing, SDTM filers can submit a single file containing the FinCEN SAR XML batch data. The file naming convention is displayed here for your convenience.
- For SDTM batch submission containing supporting documentation, filers must submit a single ZIP file containing the FinCEN SAR XML batch file along with the corresponding attachment zip file. This single ZIP file is composed of one FinCEN SAR XML batch file and one attachment ZIP file. The attachment ZIP file shall follow the same attachment requirements described in Attachment E of the User Guide. The single ZIP file name must start with "SARXST." and end with ".ZIP". For example: SARXST.SARXML_batch.ZIP. FinCEN SAR XML SDTM batch files without any attachment shall follow the naming convention described in Attachment D of this guide.
- For immediate batch validation results upon submission, an optional xml file will be provided upon request.

- This file includes all batch warnings and/or fatal errors generated by FinCEN based on the content of the batch file.

**Questions**

Please use your webinar text interface to submit your questions. We will pause for a few minutes and respond to as many questions as we can.

We will save all questions submitted and develop a follow-up webinar focused on the questions received.

We do realize this is a substantial change for batch files and want to ensure we assist you with this transition!

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(talk to specific slide details)